



Chicago Title

601 Riverside Avenue, Bldg. 5, 5th Floor
Jacksonville, FL 32204

October 18, 2019

Sears Holdings Management
Attention: David Purcel
3333 Beverly Road
Hoffman Estates, IL 60179

Escrow No.: 943402
Property Address: 3820 N. 2nd Street, Philadelphia, PA

Dear Mr. Purcel:

As you are aware, we are in receipt of conflicting demands regarding the deposit in the amount of \$223,827.47 originally given by the seller, Sears Logistics Services, pursuant to the Escrow Agreement executed on December 20, 1994.

In the event we have not been delivered mutually signed instructions from the bankruptcy trustee for Sears and William D. Staffieri, or his attorney, regarding the disbursement of this deposit by 5:00 PM on October 31, 2019, the funds and the escrow file will be submitted to legal counsel for the filing of an interpleader action.

An interpleader action is a legal process whereby the escrow funds in dispute are placed in the hands of the Court for a determination of which party is entitled to such funds. In the event this occurs, the court costs and attorney fees will be deducted from the funds prior to the disbursement to the court designated recipient.

Please be aware that this letter shall serve as our final notice to all parties. If you have any questions, please contact the undersigned.

Sincerely,

Carolyn Bird Salazar
Senior Dormant Specialist
601 Riverside Ave., 5th floor, Bldg 5 – DSG
Jacksonville, FL 32204
630-423-1854

Cc: Thomas Goslin and Jeffrey Abbott



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Jacksonville, FL 32204

October 18, 2019

Weil, Gotshal & Manges LLP
Attention: Thomas Goslin
2001 M St., NW
Suite 600
Washington, DC 20036

Escrow No.: 943402
Property Address: 3820 N. 2nd Street, Philadelphia, PA

Dear Mr. Goslin:

As you may be aware, we are in receipt of conflicting demands regarding the deposit in the amount of \$223,827.47 originally given by the seller, Sears Logistics Services, pursuant to the Escrow Agreement executed on December 20, 1994.

In the event we have not been delivered mutually signed instructions from the bankruptcy trustee for Sears and William D. Staffieri, or his attorney, regarding the disbursement of this deposit by 5:00 PM on October 31, 2019, the funds and the escrow file will be submitted to legal counsel for the filing of an interpleader action.

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Cc: David Purcel and Jeffrey Abbott



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Jacksonville, FL 32204

October 18, 2019

Jeffrey R. Abbott
108 Chesley Drive
Media, PA 19063

Escrow No.: 943402
Property Address: 3820 N. 2nd Street, Philadelphia, PA

Dear Jeff:

As you are aware, we are in receipt of conflicting demands regarding the deposit in the amount of \$223,827.47 originally given by the seller, Sears Logistics Services, pursuant to the Escrow Agreement executed on December 20, 1994.

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Senior Dormant Specialist
601 Riverside Ave., 5th floor, Bldg 5 – DSG
Jacksonville, FL 33204
630-423-1854

Cc: Thomas Goslin and David Purcel